

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Steven A. Williams

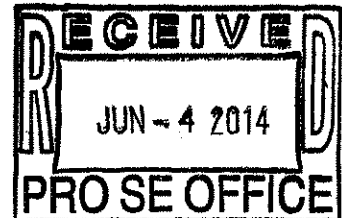
(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Rosenblatt Securities Inc.

Jury Trial: ☐ Yes ☒ No  
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)



**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Steven A. Williams  
Street Address 510 East 6th St. Apt C4  
County, City New York, New York  
State & Zip Code New York, 10009  
Telephone Number 212 665-9545

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Rosenblatt Securities Inc.  
Street Address 20 Broad St., 26th Floor

County, City New York, New YorkState & Zip Code New York, 10005Telephone Number 212 607-3100

Defendant No. 2

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State &amp; Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State &amp; Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State &amp; Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

**II. Basis for Jurisdiction:**

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (*check all that apply*)☒ Federal Questions☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Anti-retaliation provision of the Dodd-Frank Act, Rule 21F-2(b)(1) of the Exchange Act, U.S.C. 78u-6(h)(1)(a).

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? New York, New York, USA

B. What date and approximate time did the events giving rise to your claim(s) occur? \_\_\_\_\_  
Please see attached.

C. Facts: Rosenblatt Securities Inc. intentionally caused, and did cause emotional distress. I was  
"mobbed" or bullied. I was reprimanded or told I was being, "dramatic" when I complained, forced to see a  
psychiatrist as a condition of my continued employment upon threatening to resign, and ultimately fired for  
complaining. I was denied an exit interview and clarity as the reason for my termination on my U4 (Securities  
License), and threatened with arrest for continuing to insist upon both. I have had my personal and professional  
reputations destroyed, been blackballed from the industry, and suffered severe emotional distress.  
Alex Kessmsies and Gary Wishnow sabotaged my work and harassed me with the encouragement and full  
support of Joseph Gawronski and Richard Rosenblatt, and engaged in a smear campaign, impacting both my  
professional and personal relationships. Richard Rosenblatt, who is an Executive Floor Governor for the New  
York Stock Exchange, had me banned from the exchange.  
Traders from Intigral Derivatives and Jane St. Capital have helped smear my name and blackball me from the  
industry. Dr. Loraine Henricks, a personal friend of Richard Rosenblatt, helped to discredit me by implying I'm  
mentally unstable.  
Many witnessed my being bullied by Rosenblatt, but will likely not come forward for fear of retaliation. I have  
MANY emails to prove my case, and an intern, Taylor Hollen witnessed some. Kirk Katzburg was told by traders  
from Intigral derivatives not to hire me because I, "have problems". I was told by Kirk that I'd been banned from  
the NYSE, and witnessed my humiliating meeting with the head of security. Please see attached.

What  
happened  
to you?

Who did  
what?

Was anyone  
else  
involved?

Who else  
saw what  
happened?

#### IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

Rosenblatt intentionally induced a severe anxiety disorder to imply that I'm mentally unstable. I fell into deep  
depression, often feeling suicidal, and developed serious symptoms of Post-Traumatic-Stress (PTSD). I attempted  
to seek medical attention, but Rosenblatt failed to honor an agreement and provide me with three months of  
COBRA. The Manhattan DAs Crime Victims Unit eventually referred me for therapy. I'm on zoloft, and while it's  
too late for me to file a claim under the New York Whistleblower retaliation statute, I'm finally feeling well  
enough to file this action.

I have suffered severe economic hardship, and am currently in housing court facing eviction.



### III. Statement of Claims:

#### Section B. What date and approximate time did the events giving rise to your claim occur?

I allege in my SEC Whistleblower tip, and previously to a staff member of a US Congressman, that Jane St. Capital has manipulated several Exchange-Traded-Products (ETPs) beginning in 2009.

- 1) **November 9, 2009, 3:53 pm**, I email Paritosh Fnu and Michael Grad of Mellenium Management, telling them that Jane St. Capital had manipulated several ETPs. I was told that Mellenium had invested with Jane St. Capital.
- 2) **October 20, 2011, 3:00 pm**, I contact Staff Director on the US Senate Subcommittee on Securities, Insurance, and Investments and Senior Banking Aid to US Senator Jack Reed Senior, Kara M. Stein about manipulation of Commodity Exchange-Traded-Products (ETPs). Ms. Stein and I exchange a emails over the next several days and speak on the phone on October 27, 2011. I specifically mention Jane St. Capital by name and Exchange-Traded-Products manipulated by the firm. Most of the ETPs had been manipulated with the use of publically available information. Ms. Stein was appointed to the SEC by President Obama in July 2012.
- 3) **December 16, 2011, 12:00 pm**, Upon meeting Rosenblatt Securities Inc. CEO Richard Rosenblatt and President Joe Gawronski for the first time, I tell them of my conversations and forward an email exchange between myself and Ms. Stein to Joe Gawronski.
- 4) **December 16, 2011 4:30 pm**, Mr. Gawronski responds to my email saying, "Thanks for this, very interesting."
- 5) **January 2012**, I identify that VELOCITYSHARES DAILY 2X VIX SHORT TERM ETN NYSE (TVIX), issued by Credit Suisse, is going to be manipulated with the same methodology as I'd previously described to Ms. Stein.
- 6) **February 21, 2012, 4:00 pm**, I'm told that the Credit Suisse was going to halt the issuance of new shares, one of two steps required to manipulate the market price of an ETP.
- 7) **March 21, 2012, 11:00 pm**, The market price of TVIX begins to plunge on heavy volume. The two-day slide erases \$344,000,000 in market capitalization.
- 8) **April 13, 2012, 4:00 pm**, I call SEC to report market manipulation and insider trading of VELOCITYSHARES DAILY 2X VIX SHORT TERM ETN NYSE (TVIX), issued by Credit Suisse. I begin by asking, "Is sharing nonpublic information about a security not yet created considered insider trading?" The agent I spoke with didn't know, but said he'd have somebody call me back.

- 9) **April 13, 2012, 4:30 pm**, I publish research report summarizing how TVIX was manipulated, implying Credit Suisse colluded with traders to manipulate TVIX.
- 10) **April 13, 2012 4:45 pm**, I forward a copy of my report to Brendan Conway, a reporter for Barron Magazine.
- 11) **April 13, 2012 5:00 pm**, I email Massachusetts Commonwealth Secretary Gavin offering to help his investigation into TVIX and Credit Suisse.
- 12) **April 13, 2012 10:20 pm**, I forward a copy of my report to Ms. Stein and Senator Clinton.
- 13) **April 16, 2012, 10:00 am**, Justin Schack, a partner with Rosenblatt, informs me that two people from the SEC not on my regular distribution list requested permission to view my report, stating, *"It's possible that your piece even piqued (or further piqued) the interest of the regulators"*. In the body of the email was a link to an article from Reuters stating, *"U.S. regulators examining whether the exchange-traded note market is harming investors have another reason to be concerned -- the sellers of these products are helping traders bet against them, sometimes at the expense of retail investors."*
- 14) **April 16, 2012 12:00 pm**, I receive a call back from the SEC. I begin again by asking, "is sharing nonpublic information about a security not yet created insider trading?". The agent responds, "Why are you asking us? Isn't that a question for your legal department?". Not sure what to do, I end the call.
- 15) **April 16, 2012, 3:00 pm**, Mr. Conway publishes a Blog entry in the Barron's "Focus on Funds" section of Barron's, featuring my report.

### Section C. Facts

"Who else saw what happened?" (Continued from main document)

Kirk katzburg and I met with the head of Security from the NYSE. He was very polite, and said that I was welcome on the floor anytime. I was stopped two and briefly detained two additional times by security at the front door after the meeting and haven't been back. Kirk can attest that my reputation has been destroyed. Kamran Gille spoke with traders from Jane St. Capital. Kamran had told me that they, "trashed me".

My personal reputation has also been destroyed, as the result of a smear campaign involving Gary Wishnow. Wishnow and I were previously close personal friends and shared many of the same acquaintances. Simon Bakinde and Yurik Menamedov are aware that Rosenblatt sought to destroy my career and drive me from the business, but I don't know if they will testify. I've

I was the Chief Derivatives & ETP  
Strategist for Rosenblatt Securities INC.  
from Late December 2011 through  
to September 24, 2012, ~~when I~~  
~~was terminated as a result of~~

The SEC office of the whistle-  
blower referred me to Fed court,